

## EXHIBIT 8

Declaration of Litigation Support Specialist Tashieka Taylor  
dated March 9, 2021

Danielle E. Karst (D.C. Bar No. 481881)  
Timothy J. Mulreany (Maryland Bar No. 8812160123)  
**COMMODITY FUTURES TRADING COMMISSION**  
Three Lafayette Centre  
1155 21st Street, N.W.  
Washington, D.C. 20581  
Telephone: (202) 418-6158 (Karst)  
Telephone: (202) 418-5306 (Mulreany)  
Facsimile: (202) 418-5523  
dkarst@cftc.gov  
tmulreany@cftc.gov

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

COMMODITY FUTURES TRADING  
COMMISSION,

Plaintiff,

v.

DAVID GILBERT SAFFRON  
a/k/a DAVID GILBERT and  
CIRCLE SOCIETY, CORP.,

Defendants.

Case No. 2:19-cv-1697-JAD-DJA

**DECLARATION OF TASHIEKA TAYLOR  
IN SUPPORT OF THE CFTC'S REPLY  
MEMORANDUM IN SUPPORT OF ITS  
THIRD MOTION FOR AN ORDER TO  
SHOW CAUSE AS TO WHY  
DEFENDANTS SHOULD NOT BE HELD  
IN CIVIL CONTEMPT FOR  
VIOLATIONS OF THE COURT'S ASSET  
FREEZE**

I, Tashieka Taylor, hereby declare as follows:

**I. INTRODUCTION**

1. I have worked as a contractor since 2006 and have been assigned as a Litigation Support Specialist ("LSS") for Plaintiff Commodity Futures Trading Commission ("Plaintiff" or "CFTC") since August 2010. Prior to joining the CFTC, I was assigned as an LSS for the U.S. Department of Justice-Commercial Litigation Branch. I have a Bachelor of Science in Computer Science from the University of Maryland Eastern Shore.

2. I was asked to assist in the litigation of David Gilbert Saffron ("Saffron") and Circle Society, Corp. ("Circle Society") (collectively, "Defendants").

1 3. I have personal knowledge of the following facts and, if called as a witness, could and  
2 would testify competently thereto.

3 4. I submit this Declaration pursuant to 28 U.S.C. § 1746, in support of the CFTC's Reply  
4 Memorandum in Support of its Third Motion for an Order to Show Cause as to Defendants.

5 **II. SUMMARY**

6 5. On or about February 25, 2021, I was asked by CFTC staff to prepare and bates label a  
7 set of electronic, third-party subpoena documents (the "documents") which were to be produced  
8 to Defendants' Counsel.

9  
10 6. On March 1, 2021, I uploaded two zip files containing a total of 506 documents to  
11 the CFTC's secure file transfer protocol site (the "FTP site"). I placed the zip files in a folder  
12 entitled "CFTC Production to Counsel" for ease of reference, and the files were password  
13 protected. On the same day, I informed CFTC staff that the production of documents to  
14 Defendants' Counsel was completed.

15  
16 7. On the morning of March 3, 2021, I was informed by CFTC staff that Defendants'  
17 Counsel claimed that the FTP site "provided on March 1 contained no documents, only an empty  
18 folder." Prior to March 3, 2021, I never received any communication from CFTC staff or  
19 Defendants' Counsel stating that Defendants' Counsel could not open the files uploaded to the  
20 FTP site, or that the folder was empty. The first time I learned of this issue was on March 3,  
21 2021, when CFTC staff asked me to confirm that the FTP site contained the documents.

22 **III. ANALYSIS**

23  
24 8. On March 3, 2021, I accessed the FTP site, where I was able to confirm that the folder  
25 entitled "CFTC Production to Counsel" was not empty and in fact did contain the documents  
26 previously uploaded.



# **EXHIBIT A**

## **ODT Report**



## Activity - By User (Detailed)

3/4/2021 9:35:05 AM

Description: Report detailing all folder and file create and delete activity for a specific user, grouped by username, and sorted by date in reverse chronological order.

Date/Time	Remote IP	Protocol	Action	File Name	Folder	KB Trasferred	Result
<b>User Name: RKFRHZJBZE</b>							
3/3/2021 11:45:21 PM	174.68.153.26	HTTPS	sent	03-01-2021 CFTC PROD 001.zip	/EFTAdhoc/RKFRHZJBZE/CFTC Production to Counsel/	1,044,615.2	200
3/3/2021 11:38:51 PM	174.68.153.26	HTTPS	sent	03-01-2021 CFTC PROD 001.zip	/EFTAdhoc/RKFRHZJBZE/CFTC Production to Counsel/	1,044,615.2	200
3/3/2021 11:14:04 PM	174.68.153.26	HTTPS	sent	03-01-2021 CFTC PROD 002.zip	/EFTAdhoc/RKFRHZJBZE/CFTC Production to Counsel/	883.23	200
3/3/2021 10:56:52 PM	174.68.153.26	HTTPS	sent	03-01-2021 CFTC PROD 002.zip	/EFTAdhoc/RKFRHZJBZE/CFTC Production to Counsel/	883.20	200
3/1/2021 6:34:05 PM	172.20.114.83	HTTPS	created	03-01-2021 CFTC PROD 002.zip	/EFTAdhoc/RKFRHZJBZE/CFTC Production to Counsel/	881.99	200
3/1/2021 10:50:34 AM	172.20.114.89	HTTPS	created	03-01-2021 CFTC PROD 001.zip	/EFTAdhoc/RKFRHZJBZE/CFTC Production to Counsel/	1,044,614.0	200
3/1/2021 10:35:29 AM	172.20.114.89	HTTPS	dele	03-01-2021 CFTC PROD 001.zip	/EFTAdhoc/RKFRHZJBZE/Counsel Production to CFTC/	1.27	200
3/1/2021 10:34:28 AM	172.20.114.89	HTTPS	created	03-01-2021 CFTC PROD 001.zip	/EFTAdhoc/RKFRHZJBZE/Counsel Production to CFTC/	2,433.54	400
3/1/2021 10:33:54 AM	172.20.114.89	HTTPS	created	03-01-2021 CFTC PROD 001.zip	/EFTAdhoc/RKFRHZJBZE/Counsel Production to CFTC/	182,465.43	400
2/25/2021 3:11:33 PM	172.20.114.73	HTTPS	mkd		/EFTAdhoc/RKFRHZJBZE/Counsel Production to CFTC/	1.27	200
2/25/2021 3:11:18 PM	172.20.114.73	HTTPS	mkd		/EFTAdhoc/RKFRHZJBZE/CFTC Production to Counsel/	1.27	200